

# **EXHIBIT H**



**Todd & Weld**LLP

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May 11, 2022

**VIA EMAIL**

Hunter@NapoliLaw.com

Hunter Shkolnik, Esq.  
NAPOLI SHKOLNIK, PLLC  
3163 Flushing Road  
Suite 200-D  
Flint, MI 48504

Re: Consolidated Response of Non-Parties to  
Subpoena for Documents dated May 5, 2022

Dear Hunter:

I write on behalf of my clients, Veolia Water Municipal Services, LLC, Veolia Water Logistics, LLC, Inc. and Veolia Water Contract Operations USA, Inc. (collectively, "VNA"), in response to the three substantively identical subpoenas dated May 5, 2022 issued in the matter *Walters et al. v. Veolia North America et al.*, Civil Action No. 17-10164 (E.D. Mich.).

Please find enclosed Consolidated Responses and Objections by Non-Parties Veolia Water Municipal Services, LLC, Veolia Water Logistics, LLC and Veolia Water Contract Operations USA, Inc. to Plaintiffs' Subpoena to Produce Documents dated May 5, 2022 in the matter *Walters et al. v. Veolia North America et al.*, Civil Action No. 17-10164 (E.D. Mich.).

In light of the attached Objections, we do not believe that a privilege log is necessary or appropriate, but would be happy to discuss that with you if that would be helpful.

Very truly yours,

Max D. Stern

MDS/jmm  
Enclosure